

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Newport News Division)**

JOHN M. PITMAN, III, *et al.*,

Plaintiffs,

vs.

XCENTRIC VENTURES, LLC, *et al.*,

Defendants.

Civil Action No. 4:16-cv-00179

**DEFENDANT TRACEY RICHTER'S OBJECTIONS TO PLAINTIFFS'
FIRST SET OF REQUESTS FOR ADMISSION**

REQUESTS FOR ADMISSION

For her objections to Plaintiffs' First Set of Requests for Admission, defendant Tracey Richter states as follows:

1. Admit that the audio recording enclosed herein is a true and accurate recording of your conversation with Anna Richter on February 2, 2014.

OBJECTION: Tracey Richter objects to this request on the grounds that the audio recording was unlawfully or improperly obtained.

2. Admit that your voice is on the audio recording enclosed herein.

OBJECTION: Tracey Richter objects to this request on the grounds that the audio recording was unlawfully or improperly obtained.

3. Admit that Anna Richter's voice is on the audio recording enclosed herein.

OBJECTION: Tracey Richter objects to this request on the grounds that the audio recording was unlawfully or improperly obtained.


4. Admit that the voice transcribed as "TR" on the audio recording is your voice.

OBJECTION: Tracey Richter objects to this request on the grounds that the audio recording was unlawfully or improperly obtained.

Dated: May 30, 2017

TRACEY RICHTER
By Counsel

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*Counsel for Defendants Anna Richter,
Bert Pitman & Tracey A. Richter*

CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2017, I mailed the foregoing via first class mail and sent via email to:

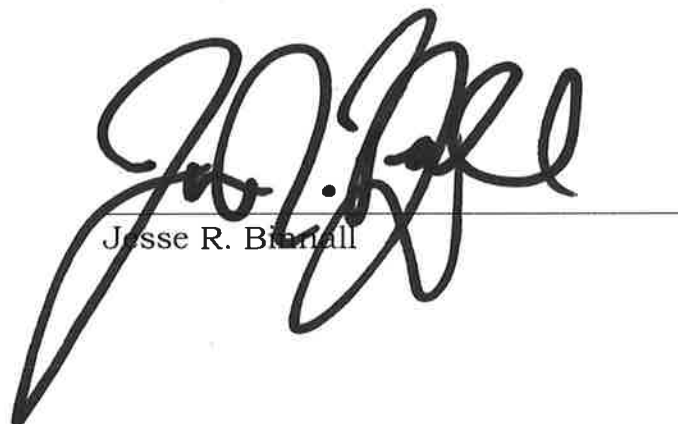
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